

## **Exhibit A**

### **Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, L.L.C., *et al.*,<sup>1</sup>  
Debtors.

Chapter 7

Case No. 19-12153 (KBO)  
(Jointly Administered)

GEORGE L. MILLER, in his capacity as  
Chapter 7 Trustee for the jointly administered  
bankruptcy estates of Bayou Steel BD  
Holdings, L.L.C., *et al.*,

Adv. No. 21-51013 (KBO)

Plaintiff,

v.

BLACK DIAMOND CAPITAL  
MANAGEMENT, L.L.C., *et al.*,

**Re: Adv. Docket No. \_\_\_\_**

Defendants.

**ORDER GRANTING PLAINTIFF'S UNOPPOSED MOTION FOR  
AUTHORIZATION TO EXCEED PAGE LIMIT WITH RESPECT TO HIS  
OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

Before the Court is Plaintiff's Unopposed Motion for Authorization to Exceed Page Limit with Respect to His Omnibus Opposition to Defendants' Motions to Dismiss (the "Motion").

Having considered the Motion, and upon good cause shown,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED;

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: Bayou Steel BD Holdings, L.L.C. (1984), BD Bayou Steel Investment, LLC (1222), and BD LaPlace, LLC (5783).

2. Plaintiff is authorized to exceed the page limit prescribed by Local Rule 7007-2 with respect to his Omnibus Memorandum, which shall not exceed 40 pages.